

DNR Improves Wastewater Facility Plan Review Process

The Iowa Department of Natural Resources took a new look at the way it reviews facility plans for wastewater treatment with a goal of reducing its project backlog and expediting approvals. At a recent Kaizen (process improvement) event, a team of DNR staff and their customers from industries, cities, and consulting engineering firms worked together to identify and eliminate the delays in the facility plan approval process.

The DNR had examined the entire wastewater construction permitting process, of which facility plan review is a major component, in 2004, leading to the name for the 2011 group of “Team Wastewater Déjà vu All Over Again.” According to Satya Chennupati, wastewater engineering supervisor, “There have been many changes in the program since 2004 that have affected the wastewater engineering section’s workload, from new water quality standards and anti-degradation analysis to hundreds of millions of dollars in federal and state stimulus dollars. It was time to take a deep breath, step back, and look at how we’re doing business and how we can do it better.”

This Kaizen event focused on the process from when an engineer and owner contacts DNR about a potential project to the approval of the facility plan. The team members from industry pointed out that when they contact DNR, they are ready to move, with a site and funding in place. There may be more uncertainty about municipal projects which can lead to projects stalling and building up a backlog of unapproved projects. The team redesigned the planning process to accommodate these differences and incorporate flexibility.

From 66 individual steps in sequential order, the team ended up with seven major tasks that may be accomplished in the order that makes sense for each project. The seven tasks are:

- Pre-Work – Screening the project for permit and facility plan requirements, assigning a project manager, setting up a project initiation meeting if needed
- Design Basis – Determining if the scope includes changes to the facility design flows and loadings, submission and review of flows and loadings, preparation of waste load allocation, determination if anti-degradation analysis needed
- Anti-degradation – Preparation and review of anti-degradation analysis, if needed
- Site Preparation – Site Survey and Report on separation distances
- Facility Plan Preparation – Development and submission of the facility plan
- Facility Plan Pre-Review – Determination of completeness of facility plan, initial review of design concept if requested by the applicant
- Facility Plan Detailed Review – Final review of completed facility plan

In the previous process, a project and project number were assigned right away. This led to a backlog of “projects” that weren’t ready for detailed facility plan review and approval. In the new process all

facility plans submitted to DNR will undergo a completeness review and the work request becomes a “project” and is assigned an official project number only when a facility plan is determined complete and DNR can commence detailed review. The DNR’s goal is to have facility plan approval for 50% of the projects within 60 days.

Kaizen events resulted in changes that can be implemented immediately, and a list of “homework” items that are developed over time to fully enact the process improvements. The immediate changes from Team Déjà vu include the following:

- An updated Preliminary Review of Facility Plan Checklist (Exhibit 9B) for use by the department and applicants in determining the completeness of a facility plan submittal
- Within 30-days of the receipt of a facility plan, the Department will provide a preliminary review using the above checklist and notify the applicant whether the facility plan has been determined to be complete or incomplete
- Projects must identify applicant/owner contact information and DNR Wastewater Engineering Section staff are to copy the project applicant/owner on ALL correspondence
- Implementation of a Wastewater Technical Assistance Helpline
 - Toll Free Long Distance Number: 855-256-9287 (855-CLN-WATR)
 - Local Number (515 prefix): 515-725-9287 (515-725-WATR)
- An updated Construction Permit Application Schedule G (Exhibit 11C) including a supplemental checklist/guidance document
- A new applicant-submitted project Work Request Form to identify critical project information
- A new self-assessment worksheet to identify project submittal requirements based on project type and funding (SRF vs. non-SRF)
- A new Land Application Permitting Process Manual separate from the Wastewater Construction Permitting Process Manual
- Development of a “fast-track” fact sheet for projects that need to proceed quickly
- An updated Wasteload Allocation (WLA) form

The longer term items include:

- Updates to the Wastewater Construction Permitting Process Manual to make it more user-friendly
- A new Clean Water State Revolving Fund (CWSRF) Manual separate from the Wastewater Construction Permitting Process Manual

- Database changes to clarify project status and timelines and to make more information accessible to owners and the public
- New submittal procedures and a new checklist for Wastewater Lagoon Site Soil Testing
- Updated feedback forms for applicants and consulting engineers to evaluate and provide comments on the construction permitting process following initial planning, facility planning and construction permitting.

One key point that was reinforced over and over throughout the Kaizen event was the importance of communication and transparency to provide better customer service. “With improved and effective communication, the process can go smoothly and efficiently for both the project owners/applicants and the DNR,” said Chennupati.

The new and updated forms listed as immediate changes can be found on the DNR’s Wastewater Construction website at:

<http://www.iowadnr.gov/InsideDNR/RegulatoryWater/WastewaterConstruction.aspx>